

May 4, 2021

**VIA ECF**

Honorable Philip M. Halpern  
United States District Judge  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601

**Re:     *Red Apple Dental PC v. The Hartford Fin. Servs. Gp., Inc., et al.*, 20-Civ-03549  
          (S.D.N.Y.)**

Dear Judge Halpern:

Our firm represents Plaintiff Red Apple Dental PC (“Red Apple”) in the above-captioned matter. We write under Rule 1(C) of Your Honor’s Individual Practices to request an adjournment of the current date set for oral argument, and to respectfully request a new date be set for the oral argument at the Court’s convenience on any date after May 24, 2021.

Defendant Sentinel Insurance Company, Ltd. (“Defendant”) filed motions to dismiss the complaint, and to dismiss the nationwide class claims (ECF Nos. 35-37; 41-43). Red Apple has opposed both these motions (ECF Nos. 44-45), and Defendant has filed replies supporting its two motions (ECF No. 46-47). Per this Court’s Order, entered on October 29, 2020, all moving papers were filed with the Court on January 25, 2021. Subsequent to briefing, both Red Apple, and Defendant filed supplemental authority with the Court (ECF Nos. 50-54). Defendant also filed, on January 25, 2021, a letter motion requesting oral argument, which Red Apple did not oppose (ECF No. 49). On April 30, 2021, this Court granted Defendant’s request for oral argument, and set oral

argument for May 10, 2021 at 10:00 a.m. at the Hon. Charles L. Brieant Jr. Federal Building and Courthouse, 300 Quarropas Street, Courtroom 521, White Plains, New York 10601 (ECF No. 55).

Plaintiff respectfully requests that the current date for oral argument be adjourned, and such argument be re-set at the Court's convenience for a date after May 24, 2021. Plaintiff seeks this relief, because Plaintiff's counsel that will be handling oral argument is scheduled for a second dose of the Moderna COVID-19 vaccination on May 11, 2021, and the Centers for Disease Control and Prevention has indicated that full vaccination is not until two weeks after the second dose of a two - dose vaccine regimen. See <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/second-shot.html>.

Previous extensions have been given in this case in connection with Defendant's time to file an Answer (ECF No. 15); and in connection with pre-motion letter writing (ECF Nos. 23, 27). No previous adjournments, or extensions have been granted in connection with this oral argument.

This extension does not affect any other scheduled dates. Defendant consents to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Y. Michael Twersky', written over the typed name.

Y. Michael Twersky